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Third Party Plaintiffs PCJV USA, LLC, PCI  
TRADING LLC, POTATO CORNER, LA  
GROUP, LLC, GK CAPITAL GROUP, LLC,  
NKM CAPITAL GROUP, LLC and GUY  
KOREN, and Defendants J & K AMERICANA,  
LLC, J&K LAKEWOOD, LLC, J&K  
OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J  
& K ONTARIO, LLC, J&K PC TRUCKS, LLC,  
HLK MILPITAS, LLC, and GK CERRITOS, LLC

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,  
INC, a Philippines corporation,

Plaintiff,

vs.

PCJV USA, LLC, a Delaware limited  
liability company; PCI TRADING , LLC, a  
Delaware limited liability company; GUY  
KOREN, an individual; POTATO CORNER  
LA GROUP, LLC, a California limited  
liability company; NKM CAPITAL GROUP,  
LLC, a California limited liability company;  
J & K AMERICANA, LLC, a California  
limited liability company; J&K  
LAKEWOOD, LLC, a California limited  
liability company; J&K VALLEY FAIR,  
LLC, a California limited liability company;  
J & K ONTARIO, LLC, a California limited  
liability company; HLK MILPITAS, LLC, a  
California, limited liability company; GK  
CERRITOS, LLC, a California, limited  
liability company; J&K PC TRUCKS, LLC,  
a California limited liability company; and,  
GK CAPITAL GROUP, LLC, a California

Case No. 2:24-CV-04546-SB(AGRx)

*Hon. Stanley Blumenfeld, Jr.*

**DECLARATION OF TODD M.  
MALYNN REGARDING  
VERDICT FORM (DKT NO. 254)**

Complaint Filed: May 31, 2024  
Trial Date: August 18, 2025

160850.00001/153289966v.1

**DECLARATION OF TODD M. MALYNN REGARDING VERDICT FORM [DKT NO. 254]**

1 limited liability company and DOES 1  
through 100, inclusive,

2 Defendants.

3  
4 PCJV USA, LLC, a Delaware limited  
liability company; PCI TRADING LLC, a  
5 Delaware limited liability company;  
POTATO CORNER LA GROUP LLC, a  
6 California limited liability company; GK  
CAPITAL GROUP, LLC, a California  
7 limited liability company; NKM CAPITAL  
GROUP LLC, a California limited liability  
8 company; and GUY KOREN, an individual,

9 Counter-Claimants,

10 v.

11 SHAKEY'S PIZZA ASIA VENTURES,  
INC, a Philippines corporation,

12 Counter Defendant.

13  
14 PCJV USA, LLC, a Delaware limited  
liability company; PCI TRADING LLC, a  
15 Delaware limited liability company;  
POTATO CORNER LA GROUP LLC, a  
16 California limited liability company; GK  
CAPITAL GROUP, LLC, a California  
17 limited liability company; NKM CAPITAL  
GROUP LLC, a California limited liability  
18 company; and GUY KOREN, an individual,

19 Third Party Plaintiffs,

20 v.

21 PC INTERNATIONAL PTE LTD., a  
Singapore business entity; SPAVI  
22 INTERNATIONAL USA, INC., a California  
corporation; CINCO CORPORATION, a  
23 Philippines corporation; and ROES 1 through  
10, inclusive,

24 Third Party Defendants.

**DECLARATION OF TODD M. MALYNN**

I, Todd M. Malynn, declare as follows:

1. I am a partner at Blank Rome LLP, counsel of record for Defendants, Counterclaimants, and Third Party Plaintiffs (collectively, “PCJV USA Parties”). I have personal knowledge of the facts set forth in this declaration, and if called upon to testify under oath, I could and would testify competently thereto.

2. I file this Declaration to provide the Court with an update as to the status of a jointly filed verdict form. On Saturday and Sunday, August 16 and 17, 2025, my colleagues Messrs. Arash Beral and Jamison Gilmore and I worked together with counsel at Fox Rothchild in preparation of the joint pretrial documents ordered to be filed on August 18, 2025, by 8:30 am.

3. As of 11:15 pm, Sunday, August 17, 2025, we had near proposed final versions of the joint pretrial documents except one, a jointly submitted verdict form, although we also had not heard back from counsel at Fox Rothchild as to the latest version of the table of completed discovery. To timely complete those filings, we requested that Fox Rothchild’s team provide those two joint filings back to us with comments or further comments by 12:00 midnight.

4. At 5:06 am the next day, Mr. Michael Murphy emailed me and Messrs. Beral and Gilmore that we would have his team’s comments at to both documents by 6:00 am to meet the 8:30 am deadline. After I responded to Mr. Murphy’s email for Fox Rothchild’s input on the table of completed discovery and verdict forms at 6:30 am, I received a near simultaneous email from Mr. Murphy attaching a redline version of the proposed joint verdict form marking up, reformatting and providing comments to the PCJV USA Parties’ proposed special verdict form. The comments were procedural, substantive and productive. We just did not receive them in time to reach agreement and prepare a joint filing by 8:30 am.

5. I worked diligently on Mr. Murphy’s marked up and proposed special verdict form as to Plaintiff’s claims addressing his comments and proposed changes

1 to the PCJV USA Parties' proposed verdict form. At 10:25 am, after accepting edits  
2 to which we agreed and making necessary edits tracking proposed jury instructions,  
3 I forwarded to Mr. Murphy proposed edits and responses to Plaintiff's proposed  
4 special verdict form as to Plaintiff's claims. I asked him to review the PCJV USA  
5 Parties' redline responses while I continued to work through his mark up and  
6 comments as to the verdict form related to the counterclaims.

7 6. After exchanging meet and confer correspondence, reformatting a  
8 proposed jointly filed special verdict form covering the claims, defenses and  
9 counterclaims, which required a lot of work to achieve Mr. Murphy's preferred  
10 formatting, I circulated a complete copy of the PCJV USA Parties' proposed special  
11 verdict form covering claims, defenses and counterclaims at 3:45 pm. We requested  
12 that Mr. Murphy include Plaintiff's proposed verdict form into the PCJV USA  
13 Parties' proposed final document or copy/paste our proposed verdict form into  
14 Plaintiff's master document and circulate a proposed final joint verdict form for  
15 filing as quickly as possible. We did not hear back from Mr. Murphy.

16 7. At 1:40 pm the next day, August 19, 2025, I emailed Mr. Murphy as to  
17 status. Again, we did not hear back from Mr. Murphy.

18 8. As of this Declaration, we still have not heard back from anyone with  
19 the Fox Rothchild team regarding Plaintiff's proposed verdict form or any further  
20 proposed redline edits or comments to PCJV USA Parties' verdict form.

21 I declare under penalty of perjury under the law of the United States that the  
22 foregoing is true and correct. Executed on August 20, 2025, in Los Angeles,  
23 California.

24  
25 /s/ Todd M. Malynn  
26 Todd M. Malynn  
27  
28

**CERTIFICATE OF SERVICE**

The undersigned certifies that on August 20, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's Electronic Case Filing (ECF) system. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.  
Executed on August 20, 2025.

By: /s/AJ Cruickshank